

SHER TREMONTE LLP


May 16, 2024

**BY ECF**

The Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Application granted.

SO ORDERED.

  
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Ronnie Abrams, U.S.D.J.  
May 17, 2024

**Re: *United States v. Yoel Abraham et al.*, 20 Cr. 411 (RA)**

Dear Judge Abrams:

As you know, we represent Yoel Abraham in the above-reference matter. We write to respectfully request a modest extension of the deadline to file Mr. Abraham's sentencing submission.

Mr. Abraham is currently scheduled to be sentenced before Your Honor on May 31, 2024. ECF 171. In accordance with Paragraph 10(A)(i) of Your Honor's Individual Rules & Practices in Criminal Cases, the deadline for the defense to file Mr. Abraham's sentencing submission is no later than two weeks before his sentencing, *i.e.*, May 17, 2024. The defense requires a modest extension of this deadline—from Friday, May 17 to Monday, May 20—to collect materials necessary for the Court's consideration at sentencing. Accordingly, we respectfully request that the Court extend the deadline to May 20, 2024.

We have conferred with the government, who consents to this request but would request an identical extension be granted to permit the government to file its submission on Monday, May 27, 2024. We do not oppose the government's request.

We thank the Court for its consideration.

Respectfully submitted,

*/s/ Noam Biale*

Noam Biale  
Justine Harris

cc: All counsel by ECF